

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**
Lynchburg Division

IN RE:
RICHARD S. ERB
HEIDI BRENNAN-ERB
Debtors

Case No. 17-60676-RBC

Chapter 13

FREEDOM MORTGAGE CORPORATION
Movant

v.
RICHARD S. ERB
HEIDI BRENNAN-ERB
Debtors/Respondents
and
HERBERT L. BESKIN
Trustee/Respondent

**MOVANT'S CERTIFICATION REQUIRED WITH
RESPECT TO MOTION FOR RELIEF FROM STAY**

1. Description of Property: 587 Toll Gate Road, Concord, VA 24538, and more particularly described as follows:

All that certain tract or parcel of real estate together with the buildings and improvements thereon and the easements and appurtenances thereunto belonging being in Long Mountain Magisterial District, Campbell County, Virginia, on State Route 658, containing 20 acres and designated as Lot 1-A of PARCEL A on a plat of survey by John D. Jacobs, C.L.S., dated November 21, 1979, a copy of which is recorded in the Clerk's Office of the Circuit Court of Campbell County, Virginia, in Deed Book 557, page 495.

It being the same property conveyed Richard S. Erb and Heidi B. Erb, his wife, from Overbey Family Partnership, L.L.P., a Virginia Limited Liability Partnership, by deed dated June 17, 2011, which deed is recorded in the aforesaid Clerk's Office as Instrument No. 110003075.

The property hereby conveyed is subject to all easements, rights-of-way, reservations and restrictions which may appear of record in the aforesaid Clerk's Office.

Pursuant to Sec. 58.1-803(D) This deed of trust is to refinance an existing debt, recorded as Instrument No. 110003076.

2. Copies of Security Instruments: Attached to the Motion for Relief from Stay as Exhibits.
3. Statement of amount due:

- | | | |
|----|-------------------------------------------------|--------------|
| a. | Unpaid Principal: | \$202,714.66 |
| b. | Accrued Interest from 01/01/2021 to 10/19/2021: | \$7,730.77 |
| c. | Late Charges: | \$0.00 |
| e. | Advances for Taxes and Insurance: | \$1,419.22 |
| f. | Other Charges: | \$3,043.29 |
| g. | Suspense Balance: | \$(-435.05) |
4. Per Diem Interest Factor: \$24.30
5. Movant's valuation of property: \$209,700.00
Basis of valuation: Debtors' schedules

I HEREBY CERTIFY, as a Member of the Bar of the Court, that I represent the above-named Movant, and that the information provided to me by the Movant and contained herein is true according to the best of my knowledge and belief.

Respectfully Submitted,

Dated: October 22, 2021

/s/ Kathryn H. Kellam
Kathryn H. Kellam VSB# 82277
BWW Law Group, LLC
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Richmond, VA 23229
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Attorney for the Movant

CERTIFICATE OF SERVICE

I certify that on this 22nd day of October, 2021, the following person(s) were or will be served a copy of the foregoing Movant's Certification Required with Respect to Motion for Relief from Stay via the CM/ECF system or by first class mail, postage prepaid:

Herbert L. Beskin, Trustee
123 East Main St., Ste. 310
Charlottesville, VA 22902

Stephen E. Dunn, Esq.
201 Enterprise Drive, Suite A
Forest, VA 24551

Richard S Erb
587 Toll Gate Rd
Concord, VA 24538

Heidi Brennan-Erb
587 Toll Gate Rd
Concord, VA 24538

/s/ Kathryn H. Kellam
Kathryn H. Kellam, Esq.
Attorney for the Movant